

Section IIIA3 of the proposed programmatic agreement states that Section 106 processes are to be exempted for "the construction of a temporary tower or facility." Notwithstanding the needs of national security, or other emergency circumstances, we strongly believe that the cognizant Native American community still must be contacted in advance of any tower installation in order to advise the entity erecting the tower of sensitive cultural locations in the area where the tower is to be placed. Once cultural artifacts are disturbed or destroyed, the ensuing damage cannot, in most cases, be reversed. We would welcome the addition of an abbreviated Section 106 process to the NPRM to facilitate expeditious installations of telecommunications facilities in emergency situations while providing Native American communities an opportunity to prevent avoidable damage or destruction of irreplaceable historic or cultural sites.